

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

MOVEMENT MORTGAGE, LLC

Plaintiff,

v.

DERAN PENNINGTON, CHRIS SHELTON,  
MATT SCHOOLFIELD, LINDA PLYMALE,  
HEATHER FRYE, JOSH COVETT and  
SUMMIT FUNDING, INC.,  
Defendants.

Civil Action No. 3:23-cv-00633

**JOINT REPORT REGARDING MEDIATION**

Pursuant to the Court's Text-Only Order dated January 30, 2025, the parties hereto are submitting this Joint Report regarding the mediation that was held on February 19, 2025. At the mediation, the parties made significant progress toward resolution. The parties are continuing to discuss, evaluate, and negotiate, and do not believe an impasse has been reached at this point in time. The parties respectfully request that the Court allow them an additional seven (7) days to continue negotiating and that they submit a joint report to the Court on or before March 5, 2025, and that the operative deadlines be stayed during that time period.

Respectfully submitted,

/s/Elizabeth H. Black

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February 24, 2025

WE CONSENT:

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